

### **REMARKS/ARGUMENTS**

These Remarks are responsive to the Office Action mailed November 23, 2004 (“Office Action”). Applicants respectfully request reconsideration of the rejections of claims 1-18 for at least the following reasons. The Office Action has been reviewed, and in view of the foregoing amendments and following remarks, reconsideration and allowance of all of the claims pending in the application are respectfully requested.

#### **Rejection under 35 U.S.C. § 102**

Claims 1-18 are rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,493,717 B1 to Junkin (“Junkin”). Applicants respectfully disagree. Junkin purports to show a system and method for managing database information to be presented in HTML format for retrieval and display by a Web browser. According to Junkin, database information is managed by responding to a user selection delivered by browser software by retrieving the contents of portions of a database and constructing an HTML-compatible presentation of the contents in accordance with definitions that hierarchically link the portions separately from any database-provided links between the portions.

Independent claims 1 recites a combination of “enabling a user to submit a user identification input and a user request to a reporting system;” “identifying the user based on user identification input;” and “controlling access to at least one database through a centralized server wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition.” Independent claims 7 and 13 recite similar limitations. These combination of claim limitations are not disclosed by Junkin. For example, the Office Action relies upon Junkin’s DataCrawler system that purportedly controls

access to databases from users. However, this disclosure fails to show the step of “controlling access to at least one database through a centralized server wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition.” Junkin fails to provide any disclosure that is directed to a centralized server that “*maps the user to at least one appropriate database based on the user request and at least one database connection definition.*”

Under 35 U.S.C. § 102, the Patent Office bears the burden of presenting at least a prima facie case of anticipation. Anticipation requires that a prior art reference disclose, either expressly or under the principles of inherency, each and every element of the claimed invention. In addition, the prior art reference must sufficiently describe the claimed invention so as to have placed the public in possession of it. In this case, as discussed in detail above, the Office Action has failed to show that Junkin discloses each and every claim limitation recited by Applicants. Therefore, the Office Action has failed to meet its burden. The rejection of claims 1-18 under 35 U.S.C. § 102(e) should be withdrawn and the claims allowed accordingly.

Claims 2-6, 8-12 and 14-18 all depend ultimately from one of independent claims 1, 7 and 13. As such, each of these dependent claims contain each of the features recited in the independent claims. For the reasons stated above, Junkin fails to disclose the claimed inventions and the rejections should be withdrawn. Additionally, these claims are separately patentable over Junkin.

**CONCLUSION**

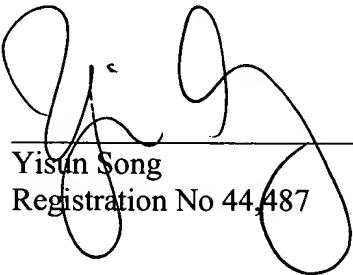
In view of the foregoing amendments and arguments, it is respectfully submitted that this application is in condition for allowance. If the Examiner believes that prosecution and allowance of the application will be expedited through an interview, whether personal or telephonic, the Examiner is invited to telephone the undersigned with any suggestions leading to the favorable disposition of the application.

It is believed that no additional fees are due for filing this Response. However, the Director is hereby authorized to treat any current or future reply, requiring a petition for an extension of time for its timely submission as incorporating a petition for extension of time for the appropriate length of time. Applicants also authorize the Director to charge all required fees, fees under 37 C.F.R. §1.17, or all required extension of time fees, to the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,

HUNTON & WILLIAMS LLP

By:

  
Yisun Song  
Registration No 44,487

Dated: May 23, 2005

Hunton & Williams LLP  
Intellectual Property Department  
1900 K Street, N.W.  
Suite 1200  
Washington, DC 20006-1109  
(202) 955-1500 (telephone)  
(202) 778-2201 (facsimile)  
YS/vrp